

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN  
CITIZENS, *et al.*,

*Plaintiffs,*

v.

GREG ABBOTT, *et al.*,

*Defendants.*

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Case No. 3:21-cv-00259  
[Lead Case]

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UNITED STATES OF AMERICA,

*Plaintiff,*

v.

STATE OF TEXAS, *et al.*,

*Defendants.*

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Case No. 3:21-cv-00299  
[Consolidated Case]

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**UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT**

Defendants Greg Abbott, John Scott, and the State of Texas, as well as Lieutenant Governor Dan Patrick, Speaker Dade Phelan, and twenty-four Texas legislators and legislative staff respectfully seek leave to exceed the page limit for discovery and case-management motions in connection with their Motion to Quash, or, in the alternative, Motion for Protective Order, attached to this motion as Exhibit B. *See* ECF 218-2. Movants seek to quash a subpoena the United States issued to the Texas Legislative Council because, among other reasons, it improperly seeks records subject to the legislative privilege, the attorney-client privilege, and other protections—belonging to and in the legal custody of members of the Texas Legislature, not TLC.

In the Western District of Texas, the page limit for discovery and case-management motions is ten pages. *See* Local Rule 7.C.2. Movants seek leave to file a motion that does not exceed nineteen

pages. Movants seek leave to ensure they have sufficient opportunity to explain the factual and legal basis of their Motion to Quash, and for other good cause. Leave will not prejudice any party. Counsel for Movants has conferred with counsel for the United States, who indicated the United States does not oppose this Motion for Leave.

### **CONCLUSION**

For the foregoing reasons, Movants respectfully request that the Court grant their motion and allow them to file a Motion to Quash that does not exceed nineteen pages.

Date: April 6, 2022

KEN PAXTON  
Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

Respectfully submitted.

/s/ Patrick K. Sweeten  
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**COUNSEL FOR MOVANTS**

**CERTIFICATE OF CONFERENCE**

I certify that counsel for Movants conferred with counsel for the United States regarding the subject of this motion. Counsel indicated the United States does not oppose this Motion for Leave.

/s/ Patrick K. Sweeten  
PATRICK K. SWEETEN

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on April 6, 2022, and that all counsel of record were served by CM/ECF.

/s/ Patrick K. Sweeten  
PATRICK K. SWEETEN